

DREISBACH

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November 2, 2020
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Comments on Potential Regulation Amendments for eTRU Credit Generation

Dreisbach Enterprises is a third-generation family-owned perishable logistics and cold chain supply provider serving customers on the West Coast since 1939. Dreisbach currently operates three facilities in Oakland and Richmond, including the recent completion of the state-of-the-art intermodal transload and consolidation facility, CoolPort Oakland, opened in Fall of 2018.

As a world-leading logistics company, Dreisbach has a very forward-thinking approach to environmental responsibility and actively participates in a variety of green initiatives including BAQMD's Goods Movement Emission Reduction Program, the EPA's SmartWay Transport Program, PG&E's Base Interruptible Program, and a variety of aggressive recycling programs.

Our 275,000 square foot CoolPort facility currently services 9,000+ railcars and 50,000+ TEU's on an annual basis, including ancillary holding capacity for up to 20,000 pallets of perishable food products. At the added cost of several million dollars to Dreisbach, we have installed electrical infrastructure to accommodate up to 200 eTRU's on site for direct connection to the grid, for which we pay all utility costs. This has decoupled the typical industry practice of running diesel gensets on site to produce power for eTRU's and has saved thousands of gallons of diesel and many tons of GHG emissions.

Dreisbach currently participates in the LCFS program with our material handling fleet, however, we believe there to be significant lost opportunity to incentivize eTRU grid connection because of the LCFS regulation's assignment of first fuel reporting entity for shipping containerized eTRU's. As the regulation stands, each eTRU is defined as the FSE, and the owner of the FSE is the eligible credit generator. Unfortunately, almost all containerized eTRU's are owned by shipping lines, who may only have a eTRU on site for a short duration before it is relocated off site or back to a ship. For this reason, it is not possible to track and maintain records of energy consumption on a per-eTRU basis.

We believe the transportation fuel mix will be most benefitted by additional infrastructure to help transition away from diesel gensets to power on-site eTRU's. We suggest that for eTRU's, the first fuel reporting entity be defined as the fleet operator, and the FSE to refer to the individual meter monitoring energy consumption to one or more eTRU.

Thank you for the opportunity to comment on the proposed amendments. If you'd like to discuss this further, or learn more about operations such as ours, please contact me at jason@dreisbach.com.

Best regards,


Jason Dreisbach

President Dreisbach Enterprises